

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	No.: 16-CR-10096-PBS
)	
STEPHANIE DAVIS)	

DEFENDANT’S MOTION TO CONTINUE SENTENCING HEARING

ASSENTED TO BY THE GOVERNMENT

Defense counsel, with the assent of the government, moves this Honorable Court to continue her sentencing hearing currently scheduled for August 24, 2017 to any date in June 2018 to allow her the full 12-month period to complete the Court’s RISE program.

Ms. Davis was accepted to the RISE program after her Rule 11 hearing; her first meeting in the program was April 27, 2017. The RISE program is typically a yearlong program overseen by the Court that offers intensive drug treatment provisions designed to ensure the sobriety and well-being of its participants. Ms. Davis attends her RISE meetings at the District Court in Worcester with Magistrate Judge Hennessey. This continuance request is made after consultation with Ms. Davis’s probation officer in the program, USPO Kelly Foster.

Ms. Davis, who had no prior criminal history before the instant case, is benefitting significantly from the RISE program. The Court’s allowance of this continuance request would greatly enhance Ms. Davis’s chances for a healthy, sober, and successful future.

For the above-stated reasons, the defendant respectfully asks for the relief requested, assented to by the government.

Respectfully submitted,
STEPHANIE DAVIS
By his attorney:

/s/ David J. Grimaldi

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DATE: July 25, 2017

CERTIFICATE OF SERVICE

I, David J. Grimaldi, hereby certify that true copies of this motion were served on AUSA Eric Rosen by ECF this 25th day of July, 2017.

/s/ David J. Grimaldi

David J. Grimaldi